

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
Email: paul@paulsouthwick.com
Phone: 503-806-9517

Timothy R. Volpert (OSB 814074)
Tim Volpert PC
2111 NE Hancock St. Ste. 2B
Portland, OR 97212
Email: tim@timvolpertlaw.com
Phone: 503-703-9054

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF
)	CAMERON MARTINEZ
U.S. DEPARTMENT OF EDUCATION and)	IN SUPPORT OF
Suzanne GOLDBERG, in her official capacity as)	MOTION TO AMEND
Acting Assistant Secretary for Civil Rights,)	MOTION FOR TRO/
U.S. Department of Education,)	PRELIMINARY
)	INJUNCTION
Defendants.)	

I, Cameron Martinez, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am very nervous to be back on campus this semester. I have so many things going on being in the last semester of my social work program that are stressful enough, on top of my chronic illness. I feel like it is going to be very bad.

3. Since news of the lawsuit, there has been a completely different shift on campus. I feel silenced now. I have been blacklisted.
4. The faculty and administration have taken it personally that I am part of this lawsuit. They have tried to intimidate and harass me. Now, they've generally stopped speaking to me. I feel like I am going to be targeted as a student and that they will try to suspend or expel me for anything they can find. I feel like they will be trying to find anything they can to punish me. There is a giant power differential on campus against me.
5. I feel like there is a target on my back.
6. I'm walking into this school year and I don't know if our LGBTQ+ group (Prism) will have to go underground again. We may have to go into hiding again because now there are targets on the backs of the LGBTQ+ students and we don't know what is going to happen.
7. When I look at the school's policies, I know that I am risking everything to be a part of this lawsuit. I could lose everything.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 24th day of August, 2021.

By: s/ Cameron Martinez

Cameron Martinez